

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

J. DOE 4, et al.,
Plaintiffs,

vs.

UNITED STATES DOGE
SERVICE, et al.,
Defendants.

CIVIL CASE NO.
8:25-cv-000462-TDC

WEDNESDAY, NOVEMBER 19, 2025
Greenbelt, Maryland

TRANSCRIPT OF PROCEEDINGS
TELEPHONIC CASE MANAGEMENT CONFERENCE
BEFORE THE HONORABLE THEODORE D. CHUANG

For the Plaintiffs:

Andrew H. Warren, Esquire
Nicole M. Rubin, Esquire
Rebecca Stevens, Esquire
Democracy Defenders Fund
600 Pennsylvania Avenue SE, Unit 15180
Washington, D.C. 20003

For the Defendants:

Jacob S. Siler, Esquire
James Wen, Esquire
U.S. Department of Justice
Federal Programs Branch
1100 L Street NW
Washington, D.C. 20005

(Proceedings Recorded by Audio Recording - Transcript Produced
by Computer-aided Transcription)

Reported by: Amanda L. Longmore, RPR, CRR, FCRR
Federal Official Court Reporter
101 W. Lombard Street, 4th Floor
Baltimore, Maryland 21201
410-962-4474

**Exhibit
A**

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P R O C E E D I N G S

(10:02 a.m.)

THE CLERK: The matter now pending before this court is Civil Action Number 25-0462-TDC, J. Doe 4, et al., versus Elon Musk, et al. We are here today for the purpose of a Case Management Conference. Beginning with the plaintiffs, counsel please identify yourselves for the record.

MR. WARREN: Good morning, Your Honor. This is Andrew Warren of Democracy Defenders Fund on behalf of the plaintiffs. I'm joined today by Beth Stevens and Nicole Rubin.

THE COURT: Good morning.

MR. SILER: Good morning, Your Honor. This is Jacob Siler with the Department of Justice on behalf of the United States, and with me on the line is James Wen, also from my office.

THE COURT: Okay. Good morning, everyone.

So we are here for a Case Management Conference. There is this notice that was filed by the defendants regarding a discovery-type motion. We also have a protective order proposal here.

And on that first point, just to clarify for everyone, everyone's in agreement with this stipulated order regarding confidentiality of discovery materials; is that correct?

MR. WARREN: This is Andrew Warren. Yes, Your Honor, on behalf of the plaintiffs we are.

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1 THE COURT: And for the Government, too?

2 MR. SILER: Your Honor, this is Jacob -- yeah, this
3 is Jacob Siler. I believe you're talking about Docket 181, and
4 that's correct, we are in agreement on that.

5 THE COURT: So the only thing I will tell you,
6 because I do this in pretty much all of these cases, is I think
7 I'm fine with it, but there's a line on the last page which I'm
8 planning to delete. It says, "The Clerk of the Court may
9 return to counsel for the parties, or destroy, any sealed
10 material at the end of the litigation, including any appeal."

11 And I typically take that line out. This order's really
12 governing what the parties are doing. I'm not going to bind
13 the court. I mean, we're certainly not releasing sealed
14 material, but the timing of what happens with things is
15 sometimes governed by other record rules and I'm not going to
16 deviate from that.

17 So if I take that line out and then sign this, does
18 anybody have any issues with that?

19 MR. WARREN: No objection from the plaintiffs, Your
20 Honor.

21 MR. SILER: None from the Government, either.

22 THE COURT: Okay. So we can get that docketed today
23 and get that taken care of.

24 Now, as for the motion for protective order on the
25 depositions, let me ask the plaintiffs, I haven't asked you to

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1 respond to the letter so nothing wrong with not having done
2 that, but I was interested in your take on not just wanting to
3 depose these individuals, and it looks like it's Mr. Musk,
4 Mr. Marocco, and Mr. Lewin, but they have a concern about
5 discovery regarding the mental processes of government actors
6 in reaching a decision. And maybe you can tell me, is that an
7 area you plan to get into and, if so, why?

8 MR. WARREN: Yes, Your Honor. Again, this is Andrew
9 Warren.

10 The short answer to the Court's question is no, we don't
11 intend to get into that. You know, that argument that the
12 Government raises is inevitable to fail for a couple of
13 reasons. One, they are bringing that from the context of
14 depositions, and the deliberative process privilege and mental
15 process privilege applies to documents. We're not aware of any
16 Fourth Circuit cases applying it to deposition testimony.

17 But beyond that, the privilege, as the Court is aware,
18 applies to predecisional information, so that's information
19 that is predecisional and deliberative in nature. It's not
20 regarding an agency's federal position.

21 And of course the privilege is not absolute. The
22 privilege only apply to opinions and not facts. There are
23 reasons behind it, of course, to protect the integrity of the
24 deliberative process. We are not intending to get into any of
25 that.

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1 The plaintiffs are seeking discovery on essentially why
2 decisions -- excuse me, not seeking discovery on why decisions
3 were made in terms of what positions the Government
4 contemplated and why they arose at -- arrived at one position
5 rather than another. That's the deliberative nature that the
6 privilege protects.

7 Instead, what the plaintiffs are seeking discovery on is
8 with regard to the Appointments Clause claim, and as the Court
9 acknowledged in its memorandum granting a preliminary
10 injunction, who made the decisions at issue and under what
11 authority they had.

12 And regarding the separation of powers claim, we need to
13 determine the current state of operations and whether those
14 operations are complying with the statutory minimum as required
15 of USAID, in addition to who made the decisions and under what
16 authority, because that pertains to whether the Executive
17 Branch exceeded its authority. But the bottom line is that the
18 information we will seek are not the deliberations but the
19 decisions themselves. The facts, not the opinions.

20 THE COURT: Okay. So leaving aside whether or not
21 certain questions leading to certain answers might be protected
22 by privilege or not, you're not planning to ask about mental
23 processes of government actors in reaching a decision, and so
24 that's not really an issue in contention as a practical matter.
25 Is that accurate?

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1 MR. WARREN: That's correct, Your Honor.

2 THE COURT: Okay. And then the letter also raises
3 this issue about these officials being high-level Executive
4 Branch officials who cannot be deposed under the Apex Doctrine,
5 I suppose except for under particular circumstances which the
6 Government says are not here.

7 I take it you don't agree with that or we wouldn't be
8 here, or maybe you can just clarify what your view is on
9 whether these officials meet that standard or not. And is the
10 issue from your perspective they don't qualify for that
11 category or that, you know, their circumstances still warrant,
12 you know, whatever the extraordinary circumstances are, or
13 both?

14 MR. WARREN: Well, there are a couple issues. But
15 first, Your Honor is correct that we do not agree with the
16 Government's position that the Apex Doctrine applies here and
17 for a couple reasons.

18 The first is that the Fourth Circuit has never adopted the
19 Apex Doctrine. It only recently acknowledged that the doctrine
20 exists, which was last year, 2025. And District Courts within
21 the Fourth Circuit have used the doctrine in contrast to other
22 circuits to limit discovery that's intended to create abuse or
23 harassment. That's not what's happening here, and the
24 Government doesn't even allege that that's what's happening
25 here.

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1 But regarding the substance of the Apex Doctrine, even
2 assuming that the Fourth Circuit recognizes it, we acknowledge
3 that generally speaking deposing Apex officials is discouraged,
4 but the reason why is because it's high-ranking officials are
5 typically removed from the daily subject of the litigation and
6 have no unique knowledge of the facts at issue. And that's
7 something that District Courts in the Fourth Circuit have
8 pointed out on several occasions.

9 I mean, the Apex Doctrine is rooted in the fact that the
10 executive, the Apex executive lacks any knowledge of the
11 relevant facts. It does not prohibit the deposition of
12 executives who have personal knowledge that are relevant to the
13 parties' claims and defenses.

14 So we really have two issues here. One is that the
15 standard in other circuits is that the parties seeking the
16 deponent must be able to show that the official has personal
17 knowledge of the facts; and secondly, that other less
18 burdensome avenues for obtaining that information have been
19 exhausted.

20 Here, the first prong is easily satisfied. We need look
21 no further than the Court's ruling in granting the preliminary
22 injunction. The Court found that there were factual questions
23 concerning Mr. Musk, Mr. Marocco, Secretary Rubio, all with
24 regard to their exercise of significant authority. That
25 pertains to both the Appointments Clause and the separation of

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1 powers claims.

2 The Court also found that even in what position Mr. Musk
3 occupied is a factual -- is in dispute and that's relevant to
4 the continuing Government -- excuse me, the continuing
5 Government position issue under the Appointments Clause and how
6 it sits.

7 And Mr. Lewin, just like Mr. Marocco and Mr. Musk and
8 Secretary Rubio, is at the center of the decisionmaking here.
9 I mean, this is not a slip-and-fall case where the plaintiffs
10 are seeking to depose these officials where someone fell
11 outside a government building.

12 The knowledge that these officials, Mr. Musk, Mr. Marocco,
13 Mr. Lewin, and potentially Secretary Rubio have, what they did,
14 when they did it, and under whose authority is the heart of the
15 factual dispute in this case.

16 Regarding the second prong --

17 THE COURT: Okay.

18 MR. WARREN: Sorry, Your Honor, I'll pause there.

19 THE COURT: Well, just for a second. I mean, the
20 letter refers to Mr. Musk, Mr. Marocco, Mr. Lewin. Are you
21 also seeking to depose Secretary Rubio or not?

22 MR. WARREN: We have not at this point, Your Honor,
23 but we haven't received discovery yet. We haven't received
24 document production from the Government despite the Court's
25 deadline. We haven't received satisfactory responses to our

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1 interrogatories. So we can't make the determination at this
2 point that we will not seek to depose Secretary Rubio but we
3 also --

4 THE COURT: But you haven't asked for it, either.

5 MR. WARREN: We have not, Your Honor, because at this
6 point we believe it would be premature anticipating the
7 information we are entitled to receive from these other
8 witnesses.

9 THE COURT: Um-hmm, okay.

10 So was there anything else you were going to add? Again,
11 this isn't necessarily argument on the motion; although, to be
12 honest, since this is a discovery issue, the hope is this
13 doesn't turn into, you know, a long drawn-out briefing process.
14 To some degree having some discussion today to narrow the
15 issues is helpful. So beyond -- what else were you going to
16 add? I don't want to cut you off.

17 MR. WARREN: Not a problem, Your Honor. I'll keep it
18 brief, recognizing we're not having the argument on the issues
19 today, but as the Court said, we are trying to identify the
20 issues and whether there's even a need to have full briefing on
21 this.

22 But the second prong of the standard under the Apex
23 Doctrine is that the -- no other witnesses have the knowledge
24 that these officials do and that other forms of discovery won't
25 suffice. Here, it's hard for the Government to argue that

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1 other individuals have the knowledge that these individuals
2 have considering they were at the center of the questions that
3 are being asked, center of the decisionmaking process.

4 But additionally, it's impossible for the Government to
5 say that we can obtain this information from other witnesses
6 when they're not producing discovery. No documents were
7 produced last week that had not been already published in other
8 cases. Their discovery production was limited to four
9 declarations submitted in other cases. Nothing internal,
10 nothing that was nonpublic and, frankly, nothing that was
11 responsive to the majority of the plaintiff document requests.

12 The Government says in their notice of motion that this
13 information could be received -- to be obtained for
14 interrogatories. The problem is they didn't provide adequate
15 responses to many of our interrogatories.

16 And just by way of example, one of the interrogatories
17 sought information about meetings that Mr. Musk had. This was
18 an interrogatory sent to the DOGE defendant, that's U.S.
19 Digital Service, DOGE, and to Ms. Gleason. And the Government
20 responded flat out saying we're not going to provide this
21 information, and now their position is we can't depose Mr. Musk
22 about what meetings he had because we can obtain the
23 information from other sources. They haven't provided the
24 information.

25 THE COURT: okay.

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1 MR. WARREN: So it's certainly premature at this
2 point to say that certain witnesses who are at the very center
3 of controversy are off limits because the information can be
4 obtained through other means.

5 I'm sorry for continuing, Your Honor, but that's all on
6 that point.

7 THE COURT: Okay. So just quickly on the other side
8 of this, and obviously, Mr. Siler, I have your letter which is
9 quite detailed so I have a good idea of what your position is,
10 but just on that last point, is it correct that you haven't
11 produced discovery in response to the written requests leaving
12 aside depositions?

13 MR. SILER: No, Your Honor. That is not accurate.
14 We have responded -- we have provided substantive responses to
15 interrogatories. And, you know, plaintiffs have identified
16 some objections to our responses, there's some follow-up
17 questions. We are conferring on those. We've taken those
18 concerns back to our client agencies and we are trying to work
19 out whether we can address those concerns.

20 On specifically the USCS issue that plaintiffs identified,
21 we do have changing arguments because those are directed at the
22 White House, but a similar interrogatory that was posed to the
23 State Department we did respond to. And, again, they had some
24 issues and had some follow-up questions with our response that
25 we are conferring on.

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1 with respect to documents, you know, our response deadline
2 was last week. Rule 34 permits us to make our production at a
3 reasonable time. We intend to make rolling productions
4 beginning this Friday. You know, I don't need to beat a dead
5 horse but there was a lapse in appropriations that set us back
6 a little bit. We asked for an extension to our response
7 deadline. We have offered on a few occasions to, you know,
8 work on an agreement to -- or extended schedule for the end of
9 discovery in this case, subject of course to our objections
10 being overruled. And obviously we would have to put that
11 before the Court but I don't -- we do not agree that it is
12 accurate to say that we have not provided discovery in this
13 case. Obviously there are issues that the parties are working
14 out, as there is in every case, but it is just simply
15 inaccurate to say that we have not produced discovery.

16 THE COURT: Okay. Well, as you all know from both
17 the local -- Case Management Order, the local rules, and the
18 federal rules, there's processes that the parties should go
19 through among themselves before we have an actual motion on
20 discovery, and the idea behind all those procedures is that
21 things get worked out if they can be. So I encourage you to do
22 that on all the issues that continue to remain in dispute, with
23 the exception of the one that we're talking about now since we
24 have gotten at least to the point of this letter.

25 what I would say at this point is, as I said, usually

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1 these things are either worked out among themselves or when a
2 discovery issue is first teed up for the Court, sometimes
3 issues can be resolved orally through a conference like this,
4 other times it requires the full motion. This is somewhere in
5 between.

6 what I will say at this point is, first, I see three
7 issues here. One is the argument that the request for
8 discovery such as the depositions of Mr. Musk, Mr. Marocco, and
9 Mr. Lewin is unnecessary and disproportioned to the needs of
10 this case.

11 I entirely disagree with that. I think in the prior
12 opinions it's been quite clear that there are factual issues
13 and these three witnesses clearly have something relevant to
14 those issues. And I don't understand the argument at all that
15 it's disproportionate to the needs of this case. This is --
16 these are the key people in the case. We're not talking about
17 deposing hundreds of people on wide-ranging issues. This is
18 very focused issues here. These are clearly key witnesses, so
19 that argument's a nonstarter and I'm going to deny any argument
20 or motion or argument that discovery should be barred because
21 it's unnecessary and disproportionate to the needs of the case.

22 On the issue of whether discovery regarding the mental
23 processes of government actors in reaching decisions is off
24 limits, whether by privilege or otherwise, is not clearly
25 stated in the letter what the reason is, which privilege, if

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1 any, but that doesn't seem to be an issue that needs to be
2 decided because the plaintiffs have said that they're not going
3 to be pursuing that kind of discovery. So it's effectively not
4 either ripe or it's moot. Whichever way you look at it, it's
5 nothing that needs to be decided. The parties basically have
6 an agreement that that won't be a subject.

7 On the third issue of whether these are high-ranking
8 government officials who should not be deposed under this Apex
9 Doctrine, I do think that is something that requires some -- a
10 formal motion with some briefing on an expedited schedule with
11 limited limitations on what needs to be said. We usually try
12 to keep discovery disputes -- try to resolve them crisply and
13 quickly without delaying the case.

14 It is a doctrine that, obviously, it's a very specific
15 legal argument that's being made and I think, one, I don't want
16 to conclude that the Government has said everything it could
17 possibly say in the letter and certainly the defense, while
18 having -- I'm sorry, the plaintiffs, although having made a
19 little bit of an oral argument here, they should have an
20 opportunity to present the cases that they're referring to.

21 So what I would ask everyone to do is to -- we'll have a
22 very tight schedule on a motion on that issue of the Apex
23 Doctrine. I would ask if the parties think they can make those
24 arguments in five pages, is that something that you see any
25 reason why we can't do that?

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1 MR. SILER: Your Honor, I have a clarifying question,
2 if I might. On the first issue about --

3 THE COURT: Sorry, which counsel is this?

4 MR. SILER: Sorry, this is -- apologies, this is
5 Mr. Siler for the Government.

6 THE COURT: Yes. Go ahead.

7 MR. SILER: On the first issue that we raised -- on
8 the first issue that we raised, and I understand both your
9 prior rulings and your ruling today that you do not wish to
10 hear more on the proportionality argument. I think the
11 Government for purposes of preservation of that argument would
12 like either a ruling prohibiting us from filing a motion on
13 that or, you know, the ability to preserve those objections in
14 a written motion.

15 That aside, I think we could work with the five-page limit
16 with respect to the -- I mean, Apex is, in my view, a bit of a
17 misnomer of the doctrine but we'll call it that for purposes --
18 for these purposes the Apex Doctrine. I think we could get
19 that done in five pages, yes.

20 THE COURT: Okay. So I understand you want to
21 preserve arguments. I mean, if we were in a trial setting in
22 the courtroom, I think the transcript of this discussion would
23 be sufficient. You've stated on the record you want to -- you
24 have a continuing objection to that ruling and this is
25 something -- this is, you know, we're on the record here, a

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1 transcript could be ordered of this, so I think you're okay.

2 And then how about from your side, Mr. Warren, in terms of
3 five pages to respond on the Apex Doctrine?

4 MR. WARREN: Your Honor, that's sufficient for the
5 plaintiffs.

6 THE COURT: Okay. So today is November 19th, I
7 believe. Could we hear from the Government, say, by Friday?
8 It seems like you have already put this argument together
9 largely through the letter anyways.

10 MR. SILER: Yes, that's sufficient timing for the
11 Government. This is Mr. Siler again. Apologies. That's
12 sufficient timing for the Government.

13 I would note that as of last night the plaintiff indicated
14 they wanted to take the deposition of Mr. Marocco I believe by
15 December 16th. I don't know if they are planning to stick to
16 that date, but I just flag that for the Court as a potential
17 timing issue.

18 THE COURT: Sure. I understand.

19 So then from plaintiff's side, could you respond by, say,
20 wednesday?

21 MR. WARREN: Yes, Your Honor.

22 THE COURT: I mean, is Tuesday possible?

23 MR. WARREN: Tuesday is possible, Your Honor.

24 THE COURT: Okay. That would be great, because that
25 way we're rolling into the Thanksgiving weekend.

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1 Okay. So on the one hand knowing that, again, we try to
2 keep discovery moving, so I am hopeful that we can get you an
3 answer, maybe not immediately after that given the Thanksgiving
4 holiday but perhaps first week of December. Probably well
5 before the 16th, although I don't know far enough in advance
6 that one could easily pivot. And my view is that while we try
7 to keep everything on track, if the Court ends up delaying this
8 process by taking longer in resolving the motion, then I'm not
9 going to prejudice, I guess, whoever wants more discovery, we
10 can probably add a little time at the end of the discovery
11 period if that's the hang-up. So it wouldn't prevent the
12 depositions or other discovery, whether it can be done on that
13 date, unclear.

14 First off, I don't know what the ruling is going to be
15 even if Mr. Marocco does even get to testify or has to testify,
16 but then if he does whether we can have that by the 16th. I
17 think we probably could, so I wouldn't say that that should be
18 taken off the table. We'll do our best to get you a ruling in
19 advance of that one way or the other.

20 And then typically for discovery, like I said, we don't
21 even always have briefing on it, so I'm not sure and I would
22 take the view, again, to keep these things moving that we don't
23 need any reply briefs on this. This seems like it's a pretty
24 discrete issue and we've already got the preview from the
25 Government, so I'll take those two briefs of five pages each

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1 and make a decision on the discovery question.

2 And we'll give you that stipulated protective order that
3 will keep everything else moving.

4 Is there anything else we should discuss while we're here
5 today?

6 MR. WARREN: Your Honor, this is --

7 MR. SILER: Your Honor --

8 [Indiscernible crosstalk.]

9 MR. WARREN: I'm sorry, Jake. Go ahead.

10 MR. SILER: Oh, no, that's fine. I don't want to --
11 certainly want to give you the opportunity to speak. But this
12 is Mr. Siler for the Government.

13 I mean, I do also want to flag for the Court that we have
14 a pending request for an interlocutory appeal that the
15 Government, and obviously that hasn't held up discovery so far,
16 but I think some of the arguments in that may become moot the
17 further into discovery we get, so we would ask just for a
18 ruling at the earliest possible time.

19 THE COURT: No, I understand that, and we have it on
20 our -- we definitely have it on our list. We know about it.
21 We're trying to work through that motion as well as all motions
22 that we get in all the cases. So yes, I understand that that's
23 there and I don't mind getting the reminder.

24 Anything else from the plaintiffs?

25 MR. SILER: Thank you, Your Honor.

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1 MR. WARREN: Yes, Your Honor. Again, this is
2 Mr. Warren for the plaintiffs.

3 At a certain point we are going to seek an extension of
4 the discovery deadline. I can get into the reasons why. The
5 Court identified potentially some of the issues just a moment
6 ago, but the bottom line is that discovery is not proceeding as
7 smoothly as we'd hoped.

8 I think the parties have engaged in many e-mails and
9 multiple meet-and-confers and we are making slow progress, but,
10 as I mentioned before, there have been some issues with the
11 Government's document production, with the response to written
12 discovery, there's been some issues in terms of getting
13 witnesses scheduled and serving deponents, and I won't, you
14 know, belabor the point with the Court.

15 But my ultimate question at this moment is would the Court
16 want us to file a notice of motion to extend discovery? The
17 defendants have told us they'd agree to an extension. The
18 issue at this point is we don't know exactly how far we will
19 need to push discovery because it's going to depend how much
20 discovery actually proceeds in a timely manner, but we did want
21 to alert the Court that both sides agree that an extension of
22 the deadline, the current discovery deadlines is necessary.

23 THE COURT: So, okay. And Mr. Siler, I think you had
24 said earlier that at least to some degree in your view things
25 have been slowed down by the shutdown, and so it would seem at

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1 a minimum just to adjust for that. There could be some
2 extension. But do you have a -- I mean, it sounds like -- I
3 mean, do you agree to some extension, although I don't know if
4 you agree on how much?

5 MR. SILER: This is Mr. Siler. Yes. I mean, I
6 believe we said this in at least one of -- maybe our extension
7 motion with respect to discovery that there have been some
8 delays related to the shutdown. We obviously did not obtain a
9 stay of the case during that period, but given those delays, I
10 think we would agree to some extension. I don't think the
11 parties have at this point ripened that agreement to a specific
12 timeline and I'm not sure that there will be a dispute about
13 how long the extension would be, but I do think that is
14 something that the parties could work on before we come back to
15 the Court about the length of that extension.

16 THE COURT: So --

17 [Indiscernible crosstalk.]

18 MR. SILER: Apologies. Again, that would be subject
19 to the specific obviously objections that we've raised about
20 particular discovery.

21 THE COURT: Sure. I mean, I think we -- typically if
22 we're all in agreement that some extension makes sense, if only
23 just to adjust for the delayed ability of the Government to
24 react during the shutdown, and then the usual approach, if you
25 can reach an agreement, which is of course highly encouraged,

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1 you would just file a joint motion or consent motion. I know
2 the Case Management Order consent motions don't need to be
3 previewed. And with a proposed order that gives the old dates
4 and the new dates and we can usually deal with that pretty
5 easily.

6 If it's contested, then, you know, I might suggest some
7 sort of notice like you've already filed, which probably
8 doesn't have to be very detailed just to tee it up because if
9 it's contested it's probably easier to deal with through a
10 conference like this than to have briefing on dates and things
11 like that, but hopefully it doesn't come to that.

12 And I don't mind, again, if you're waiting to see what
13 happens with this current motion, again, I would like to try to
14 tell you I can get you an answer pretty quickly but if for some
15 reason I'm delayed, you know, you may build that into the
16 process so maybe it makes sense to wait a little bit and see,
17 one, do I delay the process by taking longer on this motion,
18 obviously depending on whether these individuals are subject to
19 deposition or not, that could affect how much time you need.

20 And so you might want to wait, but maybe we do have a
21 common understanding that some extension is appropriate so that
22 no one gets kind of caught off guard at the end of this and
23 getting into the issues about, you know, whether the motion
24 should have been filed earlier.

25 Is that agreeable to everyone?

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1 MR. WARREN: This is Mr. Warren. That is agreeable
2 to the plaintiffs, Your Honor.

3 MR. SILER: And this is Mr. Siler, yes. Agreed on
4 behalf of the Government.

5 THE COURT: okay. okay. So we'll issue an order
6 with the dates on the briefing and also issue the protective
7 order. Is there anything else we should discuss today?

8 MR. SILER: Not from the Government.

9 MR. WARREN: Not from the plaintiffs, Your Honor.

10 THE COURT: okay. Thank you all very much, then.
11 Have a good day.

12 (The proceedings concluded at 10:30 a.m.)

13 CERTIFICATE OF OFFICIAL REPORTER

14 I, Amanda L. Longmore, Registered Professional Reporter
15 and Federal Certified Realtime Reporter, do hereby certify that
16 the foregoing is a correct transcript of the audio-recorded
17 proceedings in the above-entitled matter, audio recorded via
FTR Gold on November 19, 2025, and transcribed from the audio
recording to the best of my ability and that said transcript
has been compared with the audio recording.

18 Dated this 20th day of November 2025
19 -S-

20 AMANDA L. LONGMORE, RPR, CRR, FCRR
21 FEDERAL OFFICIAL COURT REPORTER
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